

March 17, 2011

Mr. Daniel Buckley Federal Election Commission Washington, DC 20463

Re: Amended 2010 30 Day Post General Report

Dear Mr. Buckley:

The following responds to your letter of February 10, 2011 regarding the 2010 30 Day Post-General Report, filed by the Republican Party of Texas - RPT.

Schedule B, supporting line 21b, Detail Summary Page and itemized Schedule B entries have been corrected.

We have prepared additional information disclosed in the text memo to clearly identify the joint fundraising committee and the contributions that relate to each committee. Due to software limitations, we were not able to include this information in the additional text field.

Schedule B, line 21b MEMO entry in the amount of \$390.16 has been correctly linked to a disbursement to Diane Parlapiano in the amount of \$658.85 as part of the reimbursements.

Schedule B, Line 21b payment to Malakoff totaling -\$3,000 was incorrectly reported. The vendor should have been PremierIMS, Inc. The offset was a partial offset of the amount of \$5,238. 30 paid in this reporting period on October 15, 2010 as part of the voter guide expense. This amount represents the portion of the payment that was in-kind to the campaigns reported on Line 29. The remaining \$2,238.30 offsets amounts reported as in-kind voter guide mailings on Line 23.

Transfers to non-federal accounts reported on line 22. These funds from the non-federal account were not used for disbursements influencing the election or defeat of specific federal candidates.

Schedule B line 23 reporting \$18,916.68 as Memo entries for non-federal candidates have been moved to line 29. The disbursements for the voter guide mailing reported as in-kind contributions on line 29 were two payments, one to BixOxygen in the amount of \$8.038.65 and PremierIMS, Inc. in the amount of \$2,238.30. The payment to BixOxygen in the amount of -\$8,038.65 and the payment to PremierIMS, Inc. in the amount of -\$2,238.30 to offset in-kinds to non-federal candidates on line 29 are reported on 21b. Per our conversation on March 17, the remaining \$8,639.73 of the in-kind contributions reported on line 29 is the additional value attributable to payroll and compliance expenses that the Party has reported on lines 30b and H4. The Party is not able to include memo entries on Line 29 disclosing the in-kind contributions to the non-federal candidates. Accordingly, the Party is disclosing the offset -\$8,639.73 to the in-kind contributions listed on Line 29 in a disbursement on Line 21b on this amended report.

Payments to Partida & Associates on Line 30b were amended to reflect the candidate names for which this volunteer exempt activity occurred. Other payments for generic activity were Party communications that did not reference any clearly identified candidate for Federal office nor that promoted, supported, attacked or opposed any candidate for Federal office.

As noted in your letter, payments to Bearse and Company have been disclosed on the Amended October Monthly Report in the amount of \$59,004.83 on September 30, 2010. On this report, Schedule B line 30b payments of -\$27,500 to Bearse and Company reflect in-kinds to non-federal candidates.

## Image# 11930524454 ETEXT ATTACHMENT

The payment to Laura Murray in the amount of \$317.65 has been corrected to disclose reimbursements for food and beverages to vendors who in the aggregate do not exceed \$200.

The disclosure of the payments to PremierIMS, Inc. as coordinated expenditures was incorrect. No voided check should have been reported by PremierIMS, Inc. There were no coordinated expenditures for this reporting period.

The Schedule L Aggregation page for Levin V account has been corrected to disclose the correct beginning and ending cash balances and year to date amounts for cash on hand.

The Party recognizes for future reporting that contributions to federal candidates and political committees are itemized on Schedule B line 23 and that contributions to non-federal candidates and committees are itemized on Schedule B line 29.

Schedule H4 has been corrected to show disbursements which are allocated using the appropriate allocation ratio for the fundraising events previously reported.

Tom Mechler, Treasurer Republican Party of Texas